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21 *Attorneys for Defendants*  
22 UBER TECHNOLOGIES, INC., RASIER, LLC,  
23 And RASIER-CA, LLC

24 **UNITED STATES DISTRICT COURT**

25 **NORTHERN DISTRICT OF CALIFORNIA**

26 **SAN FRANCISCO DIVISION**

27 IN RE: UBER TECHNOLOGIES, INC.,  
28 PASSENGER SEXUAL ASSAULT  
LITIGATION

29 This Document Relates to:

30 ALL ACTIONS

31 Case No. 3:23-md-03084-CRB (LJC)

32 **DECLARATION OF ALEXANDRA CARITIS  
33 IN SUPPORT OF DEFENDANTS UBER  
34 TECHNOLOGIES, INC., RASIER, LLC,  
35 AND RASIER-CA, LLC'S MOTION TO  
36 EXTEND TIME TO SERVE REBUTTAL  
37 EXPERT REPORTS**

38 Judge: Hon. Charles R. Breyer  
39 Courtroom: Courtroom 6 - 17<sup>th</sup> Floor

1 I, Alexandra Caritis, declare as follows:

2 1. I am an attorney licensed to practice law in the State of Texas and admitted *pro hac vice* in  
 3 this action. I am a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants  
 4 Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber” or “Defendants”). I  
 5 make this declaration of my own personal knowledge. If called as a witness, I could and would  
 6 competently testify to the matters set forth herein. I have knowledge of the facts set forth herein, and if  
 7 called to testify as a witness, could do so competently under oath.

8 2. Attached as **Exhibits A and B** are communications that reflect the efforts Uber has made  
 9 to secure an extension without court intervention. These communications describe what Uber understood  
 10 to be an agreement to move rebuttal deadlines in exchange for an agreement to depose the majority of  
 11 Plaintiffs’ experts near or after the October 24, 2025 rebuttal deadline, which Plaintiff’s counsel withdrew  
 12 on October 15, 2025. Uber then endeavored to resolve this dispute through a meet and confer and multiple  
 13 email correspondences, which were not successful.

14 3. The extension is necessary so that Uber’s rebuttal experts can fully understand Plaintiffs’  
 15 experts’ opinions and address Plaintiffs’ experts’ deposition testimony in their reports.

16 4. As detailed in the accompanying motion at page 2, lines 21-24, the parties have jointly  
 17 stipulated to prior extensions at ECF 3533, 3705, 3757, 3893 and 3997, which represent the relevant prior  
 18 time modifications.

19 5. The requested extension could create a need to move the Rule 702/Daubert deadlines by a  
 20 week, but Uber does not expect any additional impact on the schedule.

21 I declare under penalty of perjury under the laws of the United States and the State of California  
 22 that the foregoing is true and correct.

23 Executed on October 21, 2025, in Houston, TX.

24 \_\_\_\_\_  
 25 /s/ Alexandra Caritis  
 26 Alexandra Caritis  
 27  
 28

## **E-FILING ATTESTATION**

I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Laura Vartain Horn  
Laura Vartain Horn